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February 28, 2006

## BY HAND DELIVERY

Ms. Marlene H. Dortch Office of the Secretary **Federal Communications Commission** 445 12th Street, SW Washington, DC 20554

Re:

EB Docket No. 06-36 / EB-06-TC-060: Certification of CPNI Filing

Dear Ms. Dortch:

Telecom Italia Sparkle of North America ("TISNA"), through counsel. respectfully submits the enclosed Customer Proprietary Network Information ("CPNI") Certification for filing in EB Docket No. 06-36 and EB-06-TC-060. TISNA respectfully apologizes for the delay in submitting this certification. TISNA did not learn about the FCC's recent Public Notice in the above-referenced proceeding until February 6, 2006. TISNA operates exclusively as a provider of international wholesale services. TISNA does not provide any services to end-user customers in the United States, and TISNA does not permit CPNI to be used in its sales and marketing efforts. As TISNA desires to be in full compliance with the FCC's rules and policies, TISNA took immediate steps to implement the CPNI rules once it became aware of the Public Notice. If you have any questions regarding this filing, please contact Ms. Karly Baraga at (202) 955-9869.

Sincerely

Karly Baraga

Enclosure

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, FCC



## **Customer Proprietary Network Information Certification**

I, Joseph Rubino, Chief Financial Officer of Telecom Italia Sparkle of North America ("TISNA"), have first-hand knowledge of the procedures that TISNA has implemented to comply with the Federal Communications Commission's rules pertaining to customer proprietary network information ("CPNI"). TISNA does not use the CPNI of its customers in sales and marketing efforts. I certify that TISNA has established procedures that are sufficient to comply with the Commission's CPNI rules set forth in section 64.2001 et seq. of the FCC's rules. I relied on Attachment A in making this certification.

Signature

JOSEPH RUBINO

CHIEF FINANCIAL OFFICER

Title

2/23/06

Date



## Customer Proprietary Network Information Certification TELECOM ITALIA SPARKLE OF NORTH AMERICA, INC. Attachment A

Telecom Italia Sparkle of North America ("TISNA") has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in section 64.2001 et seq. of the FCC's rules. TISNA has trained its personnel in the appropriate use of CPNI. TISNA's handbook summarizes the appropriate use of CPNI and the disciplinary process in place for failure to use CPNI in accordance with TISNA's policy. All affected employees are required to read and sign a copy of the CPNI policy. It is TISNA's current policy not to use its customers' CPNI in sales and marketing efforts.

TISNA operates exclusively as a provider of wholesale international services. TISNA does not provide any services to end-user subscribers in the United States, nor does TISNA provide telephone exchange service or telephone toll service in the United States. Additionally, TISNA services do not generate or maintain information about the "type, destination, and amount of use of a telecommunications service subscribed to by a customer." TISNA does not share CPNI with affiliates or third parties.